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March 5, 2008 SO ORDERED

Honorable George B. Daniels United States District Judge

HON GEORGE B. DANIELS

MAR 0 5 2008

VIA FAX NO. 212-805-6737

RE: United States vs. Ellery Channing Workman No. 00CR-725-01 (GBD)

Dear Judge Daniels:

Your law clerk suggested I write you directly regarding the matter referred to above. I was previously admitted pro hoc vice to represent the defendant in this action. On May 2, 2007, you sentenced Mr. Workman to a term of 3 years probation with six months of home confinement. Mr. Workman completed the term of home confinement and has been in compliance with all of the conditions of his probation.

In January of this year, the defendant learned that his employer was closing his business operation and he obtained employment with Vaco, LLC, shortly thereafter. On January 24, 2008, I filed a motion to modify his conditions of release to enable Mr. Workman to attend a semi-annual training seminar with his employer to be held in Cabo San Lucas, Mexico. Shortly after filing the motion, Mr. Workman's employer advised him that the dates and resort location in Cabo San Lucas had been changed. I filed an amendment to my motion dated January 31, 2008, advising the court of the new location and dates.

Before my amended motion reached the Clerk's Office, an order dated February 5 was entered granting my initial motion.

I would request an order modifying the dates of the seminar to be between April 25-29, and allowing the defendant to return to his residence no later than April 30. The previous order of the court authorizes the absence from his residence for the dates of April 22-27 to return to his residence no later than April 28. Although the seminar will still be held Cabo San Lucas, it is now to be held at the Fiesta Americana Grand Los Cabo Resort.

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I would respectfully request an order modifying the conditions of probation to allow him to travel outside the United States to attend the business meeting in Cabo San Lucas, Mexico between the dates of April 25-29, returning to his residence in Nashville, Tennessee, no later than April 30. Thank you for your prompt consideration of this request.

Sincerely

ames N. Brya

jnb/amy